

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Offsites Area

Basic Chemicals Company, LLC – Geismar Plant
Geismar, Ascension Parish, Louisiana
Agency Interest Number: 3400
Activity Number: PER20030003
Draft Permit 2923-V0

I. APPLICANT

Company:

Basic Chemicals Company, LLC – Geismar Plant
P.O. Box 227
Geismar, LA 70734-0227

Facility:

Offsites Area
8318 Ashland Road
Geismar, Ascension Parish, Louisiana 70734
Approximate UTM coordinates are 693.68 kilometers East and 3341.09 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Basic Chemicals Company, LLC (Basic), a wholly owned subsidiary of Occidental Chemical Corporation, acquired ownership and operation of an industrial organic and inorganic chemicals manufacturing facility (formerly the Vulcan Chemicals – Geismar Plant (Vulcan)) in Geismar, Ascension Parish, Louisiana on June 7, 2005. Basic currently operates the Geismar Plant under Consolidated Part 70 Air Permit No. 0180-00011-V3 issued to Vulcan on April 19, 2001 and Part 70 Air Permit No. 2821-V0 for the Steam Generating Unit issued to Vulcan on December 12, 2002. The consolidated permit includes permitting requirements for the Caustic/Chlorine Process Units, the F-1 Hex Furnace, the Offsites Area, and the Chlorinated Organic Units.

This is the Part 70 operating permit renewal for the Offsites Area.

Consolidated Permit No. 0180-00011-V0 was issued to Vulcan on October 4, 1998. As required by LAC 33:III.507.E.4, Vulcan submitted four timely and complete renewal applications and Emission Inventory Questionnaires (EIQs) on April 4, 2003, six months prior to the expiration of the permit. Four renewal applications were submitted because Vulcan requested a separation of the Consolidated Part 70 Air Permit into four individual unit specific Part 70 air permits, one each for the Caustic/Chlorine Process Units, the F-1 Hex Furnace, the Offsites Area, and the Chlorinated Organic Units.

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Basic Chemicals Company, LLC acquired ownership and operation of the Vulcan facility on June 7, 2005. Basic submitted four revised renewal applications and Emission Inventory Questionnaires (EIQs), dated March 31, 2006, to reflect the recent ownership change and to incorporate updates to the renewal applications submitted by Vulcan on April 4, 2003. Each application addresses the renewal of the respective unit's Part 70 permitting requirements. This permit renewal addresses the permitting requirements for the Offsites Area.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Basic on March 31, 2006 requesting a renewal of the Part 70 operating permit requirements for the Offsites Area. Additional information dated May 11, 2006, July 19, 2006, and August 23, 2006 was also received.

A notice requesting public comment on the proposed permit will be published in *The Advocate*, Baton Rouge, Louisiana, and in the *Gonzales*, Gonzales, Louisiana. The proposed permit will also be sent to the US EPA Region VI.

In this Part 70 air permit renewal, Basic proposes to:

- Separate the Consolidated Part 70 Air Permit (Permit No. 0180-00011-V3 issued on April 19, 2001) into four separate Part 70 air permits (Caustic/Chlorine Process Units, F-1 Hex Furnace, Offsites Area, and Chlorinated Organic Units). This permit addresses the permitting requirements for the Offsites Area.
- Incorporate the Steam Generating Unit Part 70 Air Permit (Permit No. 2821-V0 issued on December 12, 2002) into the Offsites Area Part 70 permit.
- Update emission source calculation methodologies.
- Control emissions from TW-53B air stripper with the F-2 Oxy Vent Furnace.
- Control emissions with the F-2 Oxy Vent Furnace from three groundwater treatment tanks previously permitted as insignificant activities: CL-0060 Groundwater Clarifier and TK-0061 and TK-0062 Sludge Holding Tanks.
- Update the Offsites Area General Condition XVII and Insignificant Activities Lists.
- Establish a new emission point, the Final Effluent Processing (FEP) System, EIQ No. 090903. Included in this emission point will be emissions from the following previously unpermitted emission sources which have no applicable state or federal regulations: EIQ Nos. 091775 (YET, TK-53), 091887 (Alkaline Wastewater Storage Tank, TK-76), 092389 (Primary pH Reaction Tank, ST-35A), 092489 (Secondary Brine Sludge Digestion Tank, ST-35B), 092589 (Primary CO₂ Stripping Tank, ST-36A), and 092689 (Final CO₂ Stripping/Primary pH Neutralization Tank, ST-36B).
- Delete Boiler B-2 as an emission source.

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- Update emission source regulatory requirements.
- Revise the emissions estimates for the Offsites Fugitive Emissions (EIQ No. 092803) based on a recently completed site-wide fugitive component tagging effort and material balance evaluation.

This permit does not include any modifications to the Offsites Area, with the exception of controlling the TW-53B air stripper vent, the Groundwater Clarifier (CL-0060) and the Sludge Holding Tanks (TK-0061 and TK-0062) with the F-2 Oxy Vent Furnace. Because these are emission reduction projects and emission changes are evaluated in the Chlorinated Organic Units permit application (which includes the F-2 Oxy Vent Furnace), a Prevention of Significant Deterioration (PSD) Review and a Non-Attainment New Source Review (NNSR) are not required for this permit. The changes in emissions below are due to the emission reduction projects stated above and to the reconciliation of emissions where necessary based on updated emission factors, calculation methodologies, etc.

Process Description

The Offsites Area includes the Groundwater Treatment System, the Final Effluent Process (FEP) System, the Steam Generating Unit, and the Tank Farm Vent Containment System and Shipping Area.

A. Groundwater Treatment System

The Groundwater Treatment System removes solids and organics from material pumped from groundwater recovery wells. Liquid from the wells are combined into a header which flows into a clarifier. The clarifier generates a water discharge stream and a non-aqueous phase liquid discharge stream. The non-aqueous phase liquid is sent to a storage tank and destroyed in the F-1 Hex Furnace.

The water from the clarifier is filtered through cartridge filters and sent to a phase separator which separates any remaining phased organics from the water. The phased organics are sent to a waste solvent tank and destroyed in the F-1 Hex Furnace. The water phase is stripped in a steam stripper (TW-60). The steam stripper vent is also destroyed in the F-1 Hex Furnace. Following steam stripping, the treated water is sent to the Final Effluent Processing (FEP) System and discharged via an LPDES permitted outfall.

B. Final Effluent Processing (FEP) System

The Final Effluent Processing (FEP) System consists of several wastewater storage tanks, two air stripping towers, and a pH control system. Streams routed to the FEP System consist of boiler blowdown, cooling tower blowdown, process unit maintenance and washdown waters, treated groundwater effluent, process wastewater, sanitary wastewater, and process area stormwater runoff. All process unit maintenance and washdown wastewater from the organic process areas is sent to holding tanks prior to the air strippers. Stormwater and treated recovered groundwater are also processed through the air strippers. From the air strippers, the water is combined with wastewater from the inorganic process areas in the pH train.

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C. Steam Generating Unit

The Steam Generating Unit consists of one natural gas fired boiler and two natural gas/hydrogen fired boilers. Air blowers provide combustion air to the boilers. Boiler feed water purity is controlled by chemical addition, deaeration, and sediment removal before it is fed to the boilers. The steam produced by the boilers is piped to various process units within the Geismar Plant.

D. Tank Farm Vent Containment System and Shipping Area

The Tank Farm Vent Containment System collects vent gases from product storage tanks for destruction in the F-2 Oxy Vent Furnace. Individual vents from the tanks are collected in several sub-headers which combine into a main header. A vacuum is used to pull the vent gas through the header network. The vent gases are compressed prior to destruction.

The Shipping Area receives raw material via railcars and barges. The raw materials include vinyl chloride, other chlorinated hydrocarbon feed stocks, methanol, and chlorine. The Shipping Area unloads the raw materials into storage tanks. Final products, stored in various tanks in the tank farm, are shipped to customers via railcars, tank trucks, barges, pipelines, and ships.

Permitted Air Emissions

Estimated changes in permitted emissions from the Offsites Area in tons per year (TPY) are as follows:

Pollutant	Permitted Before	Permitted After	Permitted Change
PM ₁₀	30.77	23.92	- 6.85
SO ₂	2.68	2.58	- 0.10
NO _x	340.48	293.46	- 47.02
CO	157.01	142.90	- 14.11
VOC	21.45	14.88	- 6.57

VOC TAP Speciation (TPY) LAC 33:III Chapter 51 Regulated VOC TAPs			
Pollutant	Before	After	Change
1,1,2,2-Tetrachloroethane	NP	0.01	+ 0.01
1,1,2-Trichloroethane	NP	0.04	+ 0.04
1,2-Dibromoethane	NP	< 0.01	< 0.01
1,1-Dichloroethane	NP	0.03	+ 0.03
1,2-Dichloroethane	3.27	3.12	- 0.15
2,2,4-Trimethylpentane	NP	< 0.01	< 0.01
Benzene	NP	< 0.01	< 0.01
Carbon Tetrachloride	1.05	0.23	- 0.82

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VOC TAP Speciation (TPY) LAC 33:III.Chapter 51 Regulated VOC TAPs			
Pollutant	Before	After	Change
Chloroethane	0.61	0.07	- 0.54
Chloroform	1.48	1.81	+ 0.33
Hexachloro-1,3-Butadiene	0.56	0.14	- 0.42
Hexachlorobenzene	0.44	0.01	- 0.43
Hexachloroethane	0.36	0.04	- 0.32
Hexane (N-)	NP	< 0.01	< 0.01
Methanol	0.45	0.33	- 0.12
Methyl Chloride	NP	0.15	+ 0.15
Propylene Oxide	1.07	0.03	- 1.04
Toluene*	-	< 0.01	< 0.01
Trichloroethylene	0.74	0.12	- 0.62
Urethane	NP	< 0.01	< 0.01
Vinyl Chloride	NP	0.07	+ 0.07
Vinylidene Chloride	NP	0.04	+ 0.04
Xylene (M-)*	NP	0.16	+ 0.16
Total VOC TAPs	10.03	6.40	- 3.63

Other VOCs	8.48
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Non-VOC TAP Speciation (TPY) LAC 33:III.Chapter 51 Regulated Non-VOC TAPs			
Pollutant	Before	After	Change
1,1,1-Trichloroethane	3.70	0.23	- 3.47
Dichloromethane	0.78	3.71	+ 2.93
Hydrochloric Acid	0.11	0.04	- 0.07
Tetrachloroethylene	2.85	1.23	- 1.62
Total Non-VOC TAPs	7.44	5.21	- 2.23

* Highly Reactive Volatile Organic Compound (HRVOC)
NP Not Previously Permitted

Regulatory Applicability

This permit was reviewed for compliance with the Louisiana Part 70 operating permit program, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Non-Attainment New Source Review (NNSR) regulations do not apply.

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MACT Requirements

Basic Chemical's Geismar Plant is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The owner or operator of any major source that emits or is permitted to emit a Class I or Class II TAP at a rate equal to or greater than the minimum emission rate (MER) listed for that pollutant in LAC 33:III.5112, Table 51.1, shall control emissions of such TAPs to a degree that constitutes Maximum Achievable Control Technology (MACT). The following compounds are either Class I or Class II compounds, and are, facility-wide, emitted above their respective MERs: 1,1,2-trichloroethane, 1,2-dichloroethane, carbon tetrachloride, chlorobenzene, chloroform, dichloromethane, hexachloro-1,3-butadiene, tetrachloroethylene, and vinyl chloride. Sources in the Offsites Area emitting these pollutants must comply with MACT requirements. Emissions of chlorine, hydrochloric acid, and sulfuric acid (Class III TAPs), facility-wide, are also above their respective MERs, but MACT is not required for Class III or Supplemental TAPs. Basic Chemical's air toxics compliance plan (No. 92024) was approved on July 28, 1995.

Air Modeling Analysis

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
N/A			

Impact on air quality from emissions from the Offsites Area is below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

IV. PERMIT SHIELD

Not applicable.

V. PERIODIC MONITORING

Periodic monitoring is required for certain sources in this permit. All periodic monitoring shall be conducted in accordance with state and federal regulations, as applicable. See the Facility Specific Requirements of the draft Part 70 permit for monitoring requirements.

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VI. APPLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS

ID No:	Description	Requirement	Notes
09-UW	Offsites Area Unit Wide	40 CFR 63 Subpart FFFF National Emission Standards for Hazardous Air Pollutants (NESHAP): Miscellaneous Organic Chemical Manufacturing (MON)	DOES NOT APPLY. The Offsites Unit does not meet the applicability criteria of a miscellaneous organic chemical manufacturing process unit (MCPU). [40 CFR 63.2435]
090503 090603 100172	Steam Boiler, BL-903 Steam Boiler, BL-904 Steam Boiler, B-4	LAC 33:III.2201 Control of Emissions of Nitrogen Oxides (NO _x) 40 CFR 60 Subpart Db Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units 40 CFR 63 Subpart DDDDD NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Comply with all applicable requirements for industrial boilers with a rated heat capacity >= 80 MM Btu/hr. Comply with the NO _x emission limits for sources that combust natural gas. As approved in Permit No. 2821-V0 issued on December 12, 2002, monitor firing rate and oxygen concentration as an alternative to monitoring NO _x with a CEM (see Attachment 1 of this Title V permit renewal). EXEMPT. Existing large gaseous fuel units are exempt from the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this Subpart, or any other requirements in 40 CFR 63 Subpart A, except for the initial notification requirements of 40 CFR 63.9(b). [40 CFR 63.7506(b)]
F212703	Phase Storage Drum, D-2009	40 CFR 63 Subpart GGGGG NESHAP: Site Remediation	Install and operate a fixed roof according to the requirements of 40 CFR 63.902. [40 CFR 63.7895(c)]

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VII. STREAMLINED REQUIREMENTS

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Offsites Area	Lac 33:III.2122	> 10 wt% VOC	40 CFR 63 Subpart H (HON)
	La MACT Determination for Non-HON Sources	> 5 wt% Class I and II Organic TAPs	
	40 CFR 60 Subpart VV	>10 wt% VOC	
	40 CFR 63 Subpart H (HON)	>5 wt% VHAP	
	40 CFR 264 Subpart BB	>10 wt% VOC	

VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Grandfathered Status - Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Disulfide (H₂S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Toxic air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

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Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulphur.

TAP - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Basic Chemicals Company, LLC	AI #:	3400	TEMPO Activity No.:	PER20030003
Facility Name:	Geismar Plant	Remarks Submitted by:	ENVIRON		
Permit Writer:	Kyle Prestenbach	Permit Writer Email address:	Kyle.Prestenbach [Kyle.Prestenbach@LA.GOV]		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Cover Letter	Change addressee from “Mr. Thomas F. Feeney” to “Mr. Wade Allenan”. This remark is due to new information.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section III-Description, pp. 4, 5 and 6	Revise pollutant VOC, VOC TAPs, and Non-VOC TAPs “After” and “Change” emission rates to reflect the revised Offsites Unit Fugitive Emissions, EPN 092803. This remark is due to revised emission estimates for EPN 092803.	Updated permit to reflect revised fugitive emissions.
Air Permit Briefing Sheet, Section VIII-General Condition XVII Activities, p. 7	Revise Activity ID Nos., 01-GCXVII, 02-GCXVII, and 03-GCXVII “Frequency of Activity” from “7 days/yr” to “24 days/yr.” The emission estimates from these activities are based on 24 days per year. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section VIII-General Condition XVII Activities, p. 8	Revise Activity ID No., 12-GCXVII, “Frequency of Activity” from “2 events/yr” to “6 events/yr.” This remark is due to an error in the draft permit.	Updated permit to reflect remarks.

Air Permit Briefing Sheet, Section VIII-General Condition XVII Activities, p. 8	Revise Activity ID No., 22-GCXVII, "Frequency of Activity" from "2 tanks/yr" to "6 tanks/yr." This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 11	Revise Description for EQT192, 090396 Offsites Cooling Tower, CT-900 to EQT192, 090396 Offsites Cooling Tower, CT-52. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 11	Revise EQT193, EQT194, and EQT 195 LAC33:III.Chapter 15 requirements from a "2" to a "1". Albeit the boilers are exempt from the SO2 standards of Chapter 15, there are applicable recordkeeping requirements. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 11	Add a "1" to LAC 33:III.Chapter 2111 for FUG006. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 11	Add a "1" to LAC 33:III.Chapter 51 for EQT214. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 12	Revise Description for EQT215, F092987 Wastewater Air Stripper, TW-53B to EQT215, F292987 Wastewater Air Stripper, TW-53B. This remark is due to an error in the application.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 12	Revise Description for EQT218, F212803 TC/TT Vent Recovery Organic Collection Tank to EQT218, F212803 TC/TT Vent Recovery Organic Collection Tank, D-40. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Air Permit Briefing Sheet, Section X-Applicable Louisiana and Federal Air Quality Requirements, p. 13	Add a "1" to LAC 33:III.Chapter 2115 for EQT225. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.

Air Permit Briefing Sheet, Section XI-Explanation for Non-Applicability of a Source, p.20	Add LAC 33:III Chapter 2153 Does Not Apply text for source	Text for the non-applicability of LAC 33:III.2153 was added in Section XI for EQT202.
Air Permit Briefing Sheet, Section XII-Equipment List, p. 29	For the following ID Nos.: 091193; 091293; 091393; F212703; F212803; F212903; F27303; F27898; and F28193, please add the following text to the Notes for each, "or the Hex Furnace, EIQ No. 100577." This remark is due to an omission in the application.	The text, "or by the F-1 Hex Furnace, EIQ No. 100577", was added in Section XII for the sources listed.
Air Permit Briefing Sheet, 40 CFR Part 70 Specific Conditions, p. 31	In Specific Condition No. 1, last sentence, "emissions program being streamlined." should be "emissions programs being streamlined."	Updated permit to reflect remarks.
Statement of Basis, Section III-Proposed Permit/Project Information, p. 4	Revise pollutant VOC, VOC TAPs, and Non-VOC TAPs "Permitted After" and "Permitted Change" emission rates to reflect revised Offsites Unit Fugitive Emissions, EPN 092803. This remark is due to revised emission estimates for EPN 092803.	Updated Statement of Basis to reflect revised fugitive emissions.
General Information, p. 1	Under Related People, replace the following names with Linn Fink: Raymond Derrickson, Vito Fiore, Seth Haywood, Don Lierman, and Amy Sierra. Also, replace Tim Kinchen with Jimmy Villar. This remark is due to an error in the draft permit.	Company or company representative must contact David Ferrand of the Environmental Assistance Division, or email changes to LDEQ to update General Information.
General Information, p. 2	Under Related Organizations, remove all identified facilities. This remark is due to an error in the draft permit.	Company or company representative must contact David Ferrand of the Environmental Assistance Division, or email changes to LDEQ to update General Information.
Inventories, p. 1	Revise Description for EQT192, 090396 Offsites Cooling Tower, CT-900 to EQT192, 090396 Offsites Cooling Tower, CT-52. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Inventories, p. 1	Correct the Normal Operating Rate from 2.9 MM gallons/day to 2.905 MM gallons/day for the following sources: EQT205, EQT206, EQT207, EQT208, and EQT209. This remark is due to an error in the draft permit.	TEMPO accepts up to two decimal places for equipment inventories. The rates of 2.905 MM gallons/day were therefore rounded to 2.91 MM gallons/day for the sources listed.
Emission Rates for Criteria Pollutants, p. 1	Revise VOC emission rates for FU/G006 and the VOC emission rate under Permit Phase Totals to reflect revised Offsites Unit Fugitive Emissions, EPN 092803. This remark is due to revised emission estimates for EPN 092803.	Updated permit to reflect remarks.
Emission Rates for TAP/HAP & Other Pollutants, pp. 1 thru 6	Revise speciated emission rates for FU/G006 and the corresponding total emission rates under Permit Parameter Totals to reflect revised Offsites Unit Fugitive Emissions, EPN 092803. This remark is due to revised emission estimates for EPN 092803.	Updated permit to reflect remarks.

Specific Requirements, p. 1	Revise Description for EQT192, 090396 Offsites Cooling Tower, CT-900 to EQT192, 090396 Offsites Cooling Tower, CT-52. This remark is due to an error in the draft permit.	Updated permit to reflect remarks.
Specific Requirements, pp. 5 - 9	Revise the sentence in specific requirements 76, 77, 78, 106, 113, 114, 117, 120, and 123 to read as follows: "Combustion in F-2 Oxy Vent Furnace or F-1 Hex Furnace is determined as MACT." This remark is due to an omission in the application.	Updated permit to reflect remarks.
Specific Requirements, p. 16 - 17	Revise specific requirements, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 233, 237, 238, 239, 240, and 241 to reflect the revised Offsites Unit Fugitive Emissions, EPN 092803. This remark is due to revised emission estimates for EPN 092803.	Updated permit to reflect new permitted totals.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Basic Chemicals Company,LLC	AI #:	3400	TEMPO Activity No:	
Facility Name:	Basic Chemicals Company LLC Geismar, LA-70734-0277	Remarks Submitted by:	Serugudi Mani/E.S. Staff/Surveillance/CRO		
Permit Writer:	Kyle Prestenbach	Permit Writer Email address:	Kyle.prestenbach@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Draft Permit 2923-V0	Correct the Applicant's address in "Statement of Basis" Change Plaquemine to Geismar.	The permit was corrected.
2923-V0	For The Steam Boilers (B-4,BL-903,BL-904) : Have they been tested to determine the hi-lo O ₂ range to demonstrate compliance with NOx emissions? What is the frequency for fuel flow meter calibration? Have O ₂ stack monitors on the stacks been performance tested?	Yes. Permit No. 2821-V0 was issued to Vulcan for the Steam Generating Unit on December 12, 2002. This permit addresses BACT for the boilers. As per Permit No. 2821-V0 and this proposed permit, a continuous oxygen monitor installed in the flue gas is required for these boilers. This oxygen monitor must meet the requirements of 40 CFR 60, Appendix B, Performance Specification 3. The boilers must operate within the oxygen range established by the performance testing.

General Information

AI ID: 3400 Basic Chemicals Co LLC
 Activity Number: PER20030003
 Permit Number: 2923-V0

Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	0180-00011	Vulcan Materials Co - Geismar Plant	CDS Number	05-27-1993
	0180-0011	Vulcan Materials Co - Geismar Plant	Emission Inventory	02-25-2004
LAD092681824	PMT/PCCA	Basic Chemicals Co LLC	Hazardous Waste Notification	01-05-2005
LAD092681824	VULCAN CHEMICALS	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
LA0002933	LAR10B495	Vulcan Chemicals	Inactive & Abandoned Sites	01-01-1980
WPO988	LA-2848-L01A	WPC File Number	LPDES Permit #	06-25-2003
GD-005-2063	GD-005-2063	LPDES #	LPDES Permit #	01-26-2001
GD-005-2063	38835	WPC State Permit Number	LWDPS Permit #	06-25-2003
	0180-0011	Radioactive Material License	Radiation License Number	07-29-2003
70734VLCNMASHLA	70734VLCNMASHLA	Vulcan Chemicals	Solid Waste	01-08-2002
03009875	38835	SW ID#	Solid Waste Facility No.	04-30-2001
	0180-0011	Toxic Emissions Data Inventory #	TEMPO Merge	11-01-2000
	TRI #	TRI #	Toxic Emissions Data Inventory #	01-01-1991
	UST Facility ID (from UST legacy data)	UST Facility ID (from UST legacy data)	Toxic Release Inventory	07-09-2004
			Underground Storage Tanks	10-11-2002
Physical Location:	PO Box 227	Geismar, LA 707340227	Main FAX:	2254735069
Mailing Address:	Name	Mailing Address	Main Phone:	2254735000
Related People:	Raymond Derrickson	PO Box 2750 Baton Rouge, LA 708212750	2253252600 (DP)	Responsible Official for
	Raymond Derrickson	PO Box 2750 Baton Rouge, LA 708212750	2254452238 (WP)	Responsible Official for
	Linn Fink	PO Box 227 Geismar, LA 707340227	225472605 (WP)	Accident Prevention Billing Party for
	Vito Fiore	PO Box 227 Geismar, LA 707340227	2254735000 ext 535	Accident Prevention Contact for
	Seth Haywood	PO Box 2750 Baton Rouge, LA 70821	2254735017 (WP)	Air Permit Contact For
	Tim Kinchen	8318 Ashland Rd Geismar, LA 70734	5044738641 (WP)	Asbestos Contact for
	Don Lierman	8318 Ashland Rd Geismar, LA 70734	2254735000 (WP)	Underground Storage Tank Contact for
	Amy Sierra	PO Box 227 Geismar, LA 707340227	2254735000 (WP)	Hazardous Waste Permit Contact For
	Amy Sierra	PO Box 227 Geismar, LA 707340227	2254735000 (WP)	Water Billing Party for
	Jimmy Villar	PO Box 227 Geismar, LA 707340227	2254735008 (WP)	Radiation Safety Officer for
	Jimmy Villar	PO Box 227 Geismar, LA 707340227	2254735106 (WF)	Radiation Safety Officer for
	Jimmy Villar	PO Box 227 Geismar, LA 707340227	villari@vmcmail.com	Radiation Safety Officer for

General Information

Air ID: 3400 Basic Chemicals Co LLC

Activity Number: PER20030003

Permit Number: 2923-V0

Air - Title V Regular Permit Renewal

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Integrated Technical Services Inc	PO Box 2750 Baton Rouge, LA 708212750	2254735000 ext 535	Provides environmental services for
	Vulcan Chemicals	PO Box 227 Geismar, LA 707340227		Radiation License Billing Party for
	Vulcan Chemicals	PO Box 227 Geismar, LA 707340227		Air Billing Party for
	Vulcan Chemicals	PO Box 227 Geismar, LA 707340227		UST Billing Party for
	Vulcan Materials Co	1200 Urban Center Dr Birmingham, AL 35242	2052982953 (WF)	Owns
	Vulcan Materials Co	1200 Urban Center Dr Birmingham, AL 35242	2052983000 (NP)	Operates
SIC Codes:	2869, Industrial organic chemicals, nec			Operates

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.